

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

AZIZ HABBOUB,

Plaintiff,

– against –

JP MORGAN CHASE BANK, N.A., et al,

Defendants.

ECF CASE

1:11-cv-06103-RRM-JO

**PLAINTIFF'S INITIAL
DISCLOSURES**

Plaintiff Aziz Habboub ("Plaintiff"), by and through his attorney, Michael L. Ferch, Esq., makes the following initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1), based on information reasonably available to him, without waiving his right to supplement and/or amend these disclosures as new or additional information becomes available after the date of these disclosures set forth below.

I. The Name and, if Known, the Address and Telephone Number of Each Individual Likely to Have Discoverable Information that Plaintiff May Use to Support His Claims Unless Solely for Impeachment.

The following persons may have discoverable information:

1. Plaintiff Aziz Habboub;
2. Diaram Ramnarian
3. Robert Roina
4. Philip Ramsey
5. All persons identified in defendants' Initial Disclosures;
6. All persons identified in any documents produced by any party; and
7. All persons identified in any responses to interrogatories propounded by any party.

All of the individuals identified are likely to have information regarding plaintiff's claims and the facts and circumstances of defendants' discriminating actions against plaintiff.

Plaintiff does not have addresses and telephone numbers for Nos. 2-4 above, but will supplement these Initial Disclosures when obtained.

At this stage, plaintiff is not aware of the identity of other individuals likely to have information that he may use to support her claims. Plaintiff will continue his pretrial investigation and supplement these Initial Disclosures or respond to pretrial discovery requests as appropriate.

II. A Copy of or a Description by Category and Location of, All Documents, Electronically Stored Information, and Tangible Things That are in Possession, Custody or Control of Plaintiff and that Plaintiff May Use to Support His Claims, Unless Solely for Impeachment.

1. Documents regarding reports and claims of discrimination and defendants' responses thereto;
2. Defendant Chase's employee handbook;
3. all pleadings on file with the Court and/or exchanged between the parties in connection with the instant action; and
4. all documents Plaintiff produces in discovery and receives from all Defendants in discovery in connection with the instant action.

Documents from the foregoing category No. 1 are within the possession of Plaintiff.

At this stage of discovery, Plaintiff is not aware of any other documents he may use to support his claims. Plaintiff will continue his pretrial investigation and supplement his Initial Disclosures or respond to pretrial discovery requests, as appropriate.

C. A Computation of Plaintiff's Damages

At this stage of discovery, Plaintiff is unable to accurately calculate his damages and refers to the amounts sought in his Complaint. Plaintiff shall supplement this Initial Disclosure as and when further information via discovery becomes available.

D. The Ability to Copy and Inspect the Contents of Any Pertinent Insurance Agreement.

Not applicable to plaintiff.

E. Reservation of Rights and Amendments.

The responses set forth herein are made without waiving:

1. the right to object on the grounds of competency, privilege, relevancy, materiality or any other proper ground to the use of material produced herein, for any purpose, in whole or in part, in any subsequent proceeding in this action or any other action;
2. the right to object on any and all proper grounds, at any time, to discovery requests or other discovery procedures involving or relating to the subject matter addressed herein; and
3. the right at any time to revise, correct, modify, supplement, or clarify any of the responses provided herein.

Plaintiff expressly reserves the right to supplement or amend these Initial Disclosures as may be appropriate and necessary.

DATED: New York, New York
March 8, 2012

Sincerely yours, etc.,

BY:



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